

Prometheus Radio Project

flame filching, wave snatching, people-powered radio!

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Prometheus Recommendation On Translators:

Today priority between translators and LPFM is decided by order of application. Whoever got there first, is primary. Between full power stations and LPFM or translators, the full power is primary.

We think this system does not really address the most important questions of the best use in the FM band, and favors national translator repeater networks that have taken unfair advantage of filing windows and the Congressionally mandated delay of LPFM.

Our proposal is that priority should be determined by a pledge of local content origination. Translators that repeat the signal of a station that locally originates at least 8 hours per day of local programming, or 1 hour per day of locally produced news/public affairs programming, would be primary to low power stations which do not meet this pledge.

LPFMs applying in future LPFM filing opportunities would be primary to translators that do not make this pledge. The stations adherence to this pledge could easily be verified through a variety of means, such as a web-posted schedule of the station. The vast majority of radio stations have a website with a posted schedule already. In cases where both the translator and the low power station meets the requirement, it could default to the old system of first in time.

A pledge of this nature (the local public affairs preference) was used in LPTV, and the local origination preference is used in the point system for deciding priority of LPFM applicants.

We believe this approach is rooted in good policy priorities, but it is content neutral and thus philosophically apolitical. The failure of the FCC to make a distinction based on localism has plagued the FM spectrum for a long time, but with the public coming to understand that the key to many issues in media is not left/ or right but local versus syndicated, there is a great opportunity for change. The current system allots a great deal of channel space for syndicated content, but in distribution of remaining scarce and secondary spectrum, localism should come first.